

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EUFEMIA GUILLEN,

Plaintiff,

vs.

B.J.C.R. L.L.C., a Nevada Limited Liability
Company; B.J.H.S., LLC., a Nevada Limited
Liability Company; R.C.S.J., LLC, a Nevada
Limited Liability Company; Dhilan One L.L.C., a
Nevada Limited Liability Company; CHAMPAK
LAL, an Individual; and BHARAT B. LAL, an
Individual,

Defendants.

Case No.: 3:20-cv-00317-ART-CSD

ORDER APPROVING

**STIPULATION TO EXTEND TIME
FOR PLAINTIFF'S RESPONSE TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT (ECF No.
81) AND FOR DEFENDANTS'
REPLY**

(SECOND REQUEST)

Pursuant to LR IA 6-1 and LR 26-3, Defendants and Plaintiff Eufemia Guillen ("Plaintiff"), by and through their undersigned counsel, hereby stipulate to extend time for Plaintiff to Respond to Defendants' Motion for Summary Judgment (ECF No. 81) from the current deadline of April 21, 2023 through and including **April 28, 2023**. Additionally, the Defendants will have an extension to

1 **May 19, 2023** to file their Reply. This is the second request for an extension of this specific
2 deadline. The requested extension is sought in good faith and not for purposes of undue delay. The
3 reasons for the extension are as follows:

- 4 1. Plaintiff's counsel, JAMES P. KEMP, ESQ., who is primarily working on the response to
5 the summary judgment motion has been ill since the evening of Monday, April 17, 2023,
6 with cold, flu, and allergy symptoms that appears to have caused conjunctivitis in his eyes
7 that is limiting his ability to read or look at electronic screens for the extended periods of
8 time necessary to address the extensive motion response briefing necessary. It is hoped that
9 this will clear up by next week.
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- 11 2. As result of the above unexpected illness, Plaintiff's counsel has not had time to address the
12 summary judgment motion by the current deadline.
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- 14 3. Additionally, counsel need to meet with Ms. Guillen to get her input in preparing the
15 summary judgment response and will not be able to until Mr. Kemp meets with her on April
16 24th and/or 25th when he is scheduled to be in Elko for depositions in another matter.
17 Counsel requires language interpretation assistance when speaking with Ms. Guillen and this
18 is much more easily facilitated with in-person meetings.
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- 20 4. Due to workload management needs associated with the Plaintiff's extension to April 28,
21 2023 to file a Response, the Defendants will have until May 19, 2023 to file a Reply.
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Accordingly, additional time is needed and the parties request that the court grant this extension.

IT IS SO STIPULATED.

Dated this 20th day of April 2023.

KEMP & KEMP

/s/ James P. Kemp
James P. Kemp, Esq.

Attorney for Plaintiff

Dated this 20th day of April 2023.


SIMONS HALL JOHNSTON PC

/s/Sandra C. Ketner
Anthony L. Hall, Esq.
Sandra C. Ketner, Esq.

Attorneys for Defendants

ORDER

IT IS SO ORDERED.


Anne R. Traum
Anne R. Traum
United States District Court Judge

DATED: April 24, 2023